

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

J.W., a minor, by and through, Amanda Williams, Guardian and Next Friend, Case No. 3:21-cv-00663-CWR-LGI

*Plaintiff,*

Hon. Carlton W. Reeves  
Mag. LaKeysha Greer Isaac

v.

The City of Jackson, Mississippi, *et al.*,

*Defendants.*

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**UNOPPOSED MOTION FOR EXTENSION OF TIME IN RESPONSE TO  
THE MOTION FOR JUDGMENT ON THE PLEADINGS  
BY DEFENDANT CITY OF JACKSON**

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COMES NOW, the above-named Plaintiff, through counsel and pursuant to L. U. Civ. R. 7(b)(4), and respectfully moves for an unopposed extension of time to respond to Defendant City of Jackson's Motion for Judgment on the Pleadings as follows:

1. Defendant City of Jackson is one of many City Defendants that Plaintiff is suing. Among the other City Defendants are current Mayor of Jackson Chockwe A. Lumumba, Jr.; former Mayor of Jackson Tony Yarber; and three former Directors of Jackson's Public Works Department—Kishia Powell, Robert Miller and Jerriot Smash.

2. On May 12, 2022, the City of Jackson filed a Motion for Judgment on the Pleadings (Doc. 80) and a Memorandum of Law in Support of the Motion (Doc. 81) against Plaintiffs' Second Amended Complaint (Doc. 51). The other five City Defendants filed similar motions that same day. (Docs. 82-87).

3. This case is in relation to another matter currently before this Court — *P.R., et al, v. City of Jackson, Mississippi, et al.*, Dkt No. 3:21-cv-00667. Defendant City of Jackson and the other City Defendants also filed motions in the *P.R.* matter on May 12, 2022.

4. Pursuant to L. U. Civ. R. 7(b)(4) “[a]t the time the motion is served.... [c]ounsel for respondent must, within fourteen days after service of movant’s motion and memorandum brief, file a response and memorandum brief in support of the response. ... A party must make any request for an extension of time in writing to the judge who will decide the motion.”

5. Response from Plaintiff is not yet due, but Plaintiff seeks to extend the briefing schedule for his response to these eight separate motions across these two cases. Plaintiff communicated with Counsel for the City of Jackson and the other City Defendants regarding the deadline for response to their motions. Counsel for the City of Jackson does not oppose Plaintiff’s request for extension of time to respond.

6. As such, Plaintiff requests an additional extension up to and including August 16, 2022 in which to respond to the City of Jackson's Motion for Judgment on the Pleadings.

7. The relief sought will not delay the administration of this matter in any way. Further, this request is being made for good cause and is not made for the purpose of delay, harassment, or any other purpose rooted in bad faith.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests this Court enter an order for the extension of deadlines for Plaintiff's Response to Defendant City of Jackson's Motion for Judgement on the Pleadings. Plaintiff shall be allowed an extension up to and including August 16, 2022, for his response to the Defendant City of Jackson's Motion.

Dated: May 20, 2022.

Respectfully submitted,

**LEVY KONIGSBERG, LLP**

/s/ Kimberly L. Russell

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*Attorneys for Plaintiff.*

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2022, the foregoing document was filed via the U.S. District Court's CM/ECF electronic system and a copy thereof was served upon all counsel of record.

/s/ Kimberly L. Russell  
Kimberly L. Russell